REMARKS

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of June 7, 2005.

Reconsideration of the Application is requested.

The Office Action

Claims 1-8 and 14-16 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,884,014 to Huttenlocher, et al.

Claim 17 has been objected to as being dependent upon a rejected base claim, but is otherwise indicated as containing allowable subject matter.

Claims 9-13 have been allowed.

Comments/Arguments

Applicant greatly appreciates the Examiner's acknowledgement that claims 9-13 are allowable. Claim 17 has been rewritten in independent format, and is now also allowable.

Currently amended independent claim 1 calls for: receiving digital image data compressed according to a defined pattern matching technique, where the digital image data includes coded image content data and a decoding pattern dictionary containing one or more image patterns substitutable for the coded image content data; and revising at least one of the one or more image patterns already in the decoding pattern dictionary. Huttenlocher fails to anticipate the foregoing.

In particular, Huttenlocher does not teach revising at least one of the one or more image patterns already in the decoding pattern dictionary. The Office Action cites to col. 14, line 32 and equates the referenced token dictionary to the claimed pattern dictionary. Moreover, citing col. 14, lines 30-34, the Office Action appears to allege that adding a shape to the token dictionary reads on the claimed revising element/step. This interpretation, however, is flawed. Huttenlocher does not teach revising a pattern already in a dictionary as claimed. Rather, Huttenlocher teaches adding a new pattern/token to a dictionary. More specifically, while the claim calls for revising a pattern already in a dictionary, Huttenlocher teaches revising a dictionary by adding a new pattern/token to the dictionary. Revising the dictionary by adding a new token/pattern is not the same as revising a pattern already contained in a dictionary.

Accordingly, claim 1 distinguishes patentably over the reference, along with claims 2-8 that depend therefrom.

Currently amended claim 14 also distinguishes patentably over the reference, along with claims 15 and 16 that depend therefrom. In particular, claim 14 calls for receiving a data stream including a dictionary and a coded portion, said dictionary including one or more separate identifiable patterns in the image and said coded portion referencing the identifiable patterns in the dictionary; image processing a particular pattern in the dictionary; and replacing the particular pattern in the dictionary with the image processed version of that particular pattern. Huttenlocher fails to anticipate the foregoing. Specifically, Huttenlocher fails to teach the claimed image processing and replacing. The cited text of Huttenlocher does not teach these elements/steps. Huttenlocher does not teach image processing a particular pattern within a dictionary and then replacing that pattern with the image processed version of itself. Rather, Huttenlocher merely teaches expanding and/or altering the dictionary as a whole by adding a new token/pattern. Adding a new token/pattern to a dictionary is not the same as image processed version of itself. These actions are simply not equivalent/interchangeable.

CONCLUSION

For the reasons detailed above, it is submitted that all the claims remaining in the application are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

No additional fee is believed to be required for this Amendment A. However, the undersigned attorney of record hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Deposit Account No. 24-0037.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call the undersigned, at Telephone Number (216) 861-5582.

Respectfully submitted,

FAY, SHARPE, FAGAN, MINNICH & McKEE, LLP

September 7, 2005

Date

Jøhn P. Cornely Reg. No. 41,687

1100 Superior Avenue, 7th Floor Cleveland, Ohio 44114-2579

(216) 861-5582

N:\XERZ\200427\IEW0003127V001.doc